

MARC RODRIGUEZ, OSB No. 201019
Deputy City Attorney
marc.rodriguez@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089

Of Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BEA LAKE.,

PLAINTIFF,

v.

CITY OF PORTLAND, a municipal corporation, Portland Police Bureau ("PPB") Police Officer ("P.O") John Doe (the name John Doe being fictitious, as the true name and shield number is not presently known), in their individual capacities,

DEFENDANTS.

3:22-cv-00818-SI

[PROPOSED] STIPULATED JUDGMENT

Based on Defendant City of Portland's ("Defendant" or "City") Offer of Judgment in the amount of Fifteen Thousand Dollars and Zero Cents (\$15,000.00) plus attorneys' fees and costs in the sum of Ten Thousand Dollars and Zero Cents (\$10,000.00), and Plaintiff Bea Lake's ("Plaintiff") subsequent acceptance of that Offer of Judgment that was entered on September 18, 2023 (ECF No. 19), the Court hereby enters this STIPULATED JUDGMENT in favor of Plaintiff and against the City in the total sum of Twenty-Five Thousand Dollars and Zero Cents (\$25,000.00).

///

This Stipulated Judgment shall not be construed as an admission of liability by the City nor an admission that Plaintiff suffered any damages.

IT IS SO STIPULATED BY THE PARTIES:

DATED: October 5, 2023

/s/ Jane L. Moisan [signature authorized]
Jane L. Moisan, OSB No. 181864
Of Attorneys for Plaintiff Bea Lake

DATED: October 12, 2023

/s/ Marc Rodriguez
Marc Rodriguez, OSB No. 201019
Of Attorneys for Defendant City of Portland

IT IS SO ORDERED AND ADJUDGED:

DATED: _____

Honorable Michael H. Simon
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **[PROPOSED] STIPULATED JUDGMENT**
on the following parties by the method indicated:

Jane L Moisan People's Law Project 818 SW 3rd Ave, #221-3789 Portland, OR 97204 <i>Of Attorneys for Plaintiff</i>	<input checked="" type="checkbox"/> Electronic service via the Court's CM/ECF electronic filing system for registered users. <input type="checkbox"/> Mail in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service. <input type="checkbox"/> Hand delivery <input type="checkbox"/> Facsimile transmission
---	--

Dated: October 12, 2023

/s/ Marc Rodriguez

Marc Rodriguez, OSB No. 201019
Deputy City Attorney
marc.rodriguez@portlandoregon.gov
Of Attorney for Defendant City of Portland